# **Thomas Freedman Jr.** (OSB No. 080697) thomas@prllaw.com **Pearl Law LLC**

552 SW 5th Avenue, Suite 1100

Portland, Oregon 97204

Tel: (503) 295-6296 | Fax: (503) 295-6344

Valentin Gurvits (pro hac vice) vgurvits@bostonlawgroup.com Matthew Shayefar (pro hac vice) matt@bostonlawgroup.com Boston Law Group, PC

825 Beacon Street, Suite 20

Newton Centre, Massachusetts 02459

Tel: (617) 928-1800 | Fax: (617) 928-1802

Sean Ploen (pro hac vice) sploen@ploen.com

Ploen Law Firm, PC

100 South Fifth Street, Suite 1900 Minneapolis, Minnesota 55402

Tel: (651) 894-6800 | Fax: (651) 894-6801

Evan Fray-Witzer (pro hac vice) evan@CFWLegal.com Ciampa Fray-Witzer, LLP

20 Park Plaza, Suite 505

Boston, Massachusetts 02116

Tel: (617) 426-0000 | Fax: (617) 507-8043

Attorneys to Counterclaim Defendant Alexander Zhukov

# UNITED STATES DISTRICT COURT DISTRICT OF OREGON – PORTLAND DIVISION

#### CALISTA ENTERPRISES LTD.,

a Republic of Seychelles company,

Plaintiff,

- V. -

### TENZA TRADING LTD.,

a Cyprus company,

Defendant.

Case No. 3:13-cv-01045-SI

NOTICE OF <u>LIMITED</u> APPEARANCE BY COUNTERCLAIM DEFENDANT ALEXANDER ZHUKOV TENZA TRADING LTD.,

a Cyprus company,

Counterclaim Plaintiff,

- V. -

CALISTA ENTERPRISES LTD.,

a Republic of Seychelles company, and

ALEXANDER ZHUKOV,

a Czechoslovakian citizen,

Counterclaim Defendants.

Counterclaim Defendant Alexander Zhukov, by and through undersigned counsel, hereby enters a limited appearance in this matter for the limited purpose of challenging service of process and jurisdiction, and opposing Counterclaim Plaintiff's Motion for Default Judgment (Docket No. 90), without waiving any defenses or defects, including, without limitation, as to lack of personal jurisdiction, improper venue, inconvenient forum, insufficient process, insufficient service of process, or failure to state a claim upon which relief may be granted.

Counterclaim Defendant Alexander Zhukov is concurrently filing herewith his opposition to Counterclaim Plaintiff's Motion for Default Judgment.

Dated: June 23, 2014

Respectfully Submitted, Counterclaim Defendant Alexander Zhukov By his Attorneys,

/s/ Matthew Shayefar

Matthew Shayefar (pro hac vice) Valentin Gurvits (pro hac vice) Boston Law Group, PC 825 Beacon Street, Suite 20 Newton Centre, Massachusetts 02459

Tel: (617) 928-1800 Fax: (617) 928-1802 matt@bostonlawgroup.com vgurvits@bostonlawgroup.com

# /s/ Evan Fray-Witzer

Evan Fray Witzer (*pro hac vice*) Ciampa Fray-Witzer, LLP 20 Park Plaza, Suite 505 Boston, Massachusetts 02116

Tel: (617) 426-0000 Fax: (617) 507-8043 evan@CFWLegal.com

## /s/ Thomas Freedman Jr.

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Tel: (503) 295-6296 Fax: (503) 295-6344 thomas@prllaw.com

#### /s/ Sean Ploen

Sean Ploen (*pro hac vice*) Ploen Law Firm, PC 100 South Fifth Street, Suite 1900 Minneapolis, MN 55402

Tel: (651) 894-6800 Fax: (651) 894-6801 sploen@ploen.com